in view of U.S. Patent No. 6,311,194 to Sheth et al. (hereinafter "the Sheth et al. patent"). Applicant respectfully traverses the rejection.

Claim 1 provides for a method of creating a custom database. The method includes, *inter alia*, generating a search engine based upon a system description, wherein the search engine stores and locates data in the custom database.

With reference to FIG. 2 of the present application, there is a schematic of an exemplary system that employs the method of claim 1. A code generator 230 receives a system description in a mark-up language file 200. Based on the system description, code generator 230 generates a database structure 240 and a search engine program 250.

The Shah et al. article is directed to correlating information relating to web-based media (Abstract). Applicant's copy of the Shah et al. article does not contain page numbers, but Applicant is designating, as page 266, the page having the Abstract. The article describes an MREF as a representation of an information request that would be processed when a page that embeds the MREF is viewed (page 266, col. 2, paragraph beginning continued from col. 1), and describes MREF processing in the context of an InfoQuilt system (Page 270, col. 2, paragraph being continued from col. 1). The InfoQuilt system includes an InfoQuilt server where information requests are processed (page 266, col. 1, paragraph beginning with the phrase "Exploiting").

The InfoQuilt system is apparently a preferred, and possibly required, environment for the technique described in the Shah et al. article. For example, section 5 of the article, beginning on page 273, presents several alternative search technologies, yet on page 274, col. 2, paragraph beginning with the phrase "Key distinctions", the article emphasizes distinctions and purported advantages of the InfoQuilt system. Thus, the Shah et al. article discloses (1) that an MREF is a representation of information for facilitating a search, and (2) use of MREFs in an existing search architecture (i.e., InfoQuilt).

Applicant respectfully submits that since InfoQuilt exists, and is not described as being generated by the system in the Shah et al. article, in the Shah et al. article there is **no disclosure of generating a search engine**. Moreover, since MREFs are used in the context of InfoQuilt, since InfoQuilt exists, and since InfoQuilt is described as being advantageous over other technologies, the Shah et al. article **does not provide any motive to employ another search engine**. Consequently, the Shah et al. article neither describes nor suggests generating a search engine, as recited in claim 1.

Page 2 notes that the Shah et al. article mentions uses of web crawlers and search engines. However, the Shah et al. article does not describe such web crawlers and search engines as being generated by the system described in the article. Accordingly, Applicant maintains that the Shah et al. article's mentioning of web crawlers and search engines is neither describes nor suggestive of generating a search engine, as recited in claim 1.

The Sheth et al. patent is specifically directed toward a system and method for creating a database of metadata. Applicant has not found any disclosure of generating a search engine, as recited in claim 1.

Page 3 notes that the Sheth et al. patent (FIG. 5) discloses a use of a web crawler 3. However, the Sheth et al. patent does not describe the system or method disclosed therein as generating web crawler 3. As such, Applicant maintains that the Sheth et al. patent's disclosure of web crawler 3 is neither descriptive nor suggestive of generating a search engine, as recited in claim 1

In summary, with regard to claim 1, the Shah et al. article and the Sheth et al. patent, whether considered individually or in combination with one another, neither describe nor suggest all of the elements of claim 1. As such, claim 1 is patentable over the cited combination of references.

Independent claims 14 and 27 each recite generating a search engine. Thus, for reasons similar to that provided above in support of claim 1, Applicant submits that claims 14 and 27 are patentable over the cited combination of references.
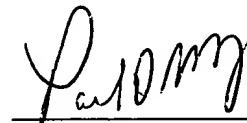
All of the dependent claims depend from one of claims 1, 14 and 27. By virtue of such dependence, the dependent claims are also patentable over the cited combination of references.

Applicant respectfully requests reconsideration and withdrawal of the section 103(a) rejection of claims 1 – 39.

In view of the foregoing, Applicant respectfully submits that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicant respectfully requests favorable consideration and that this application be passed to allowance.

Respectfully submitted,

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